



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/ICR/CRH
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 11, 2019

By ECF and Email

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Re: United States v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the government writes to provide notice of its intention to call at trial Ambassador Luis C. deBaca (ret.) to provide expert testimony regarding human trafficking and forced labor. Ambassador deBaca was the Ambassador-At-Large to Monitor and Combat Trafficking in Persons, and Senior Advisor to the United States Secretary of State from May 2009 to November 2014. He is currently the Robina Fellow in Modern Slavery at Yale University. A detailed resume reflecting his qualifications is attached hereto as Exhibit 1.

Ambassador deBaca is expected to testify at trial as an expert on human trafficking and forced labor. He is expected to testify, based on his research and experience as a leader in these fields, about the complex nature of forced labor and human trafficking operations. This includes, but is not limited to: the methods by which perpetrators coerce victims; why certain victims may be treated better than others; why victims may initially volunteer to participate in a forced labor scheme; why victims may not realize they are victims; why victims do not attempt to escape. Ambassador deBaca is also expected to testify regarding particular aspects of human trafficking and forced labor that are prevalent in, or unique to, the People's Republic of China.

The government reserves the right to call substitute expert witnesses as well as to call additional expert witnesses, and will provide advance notice of any intent to do so. If you have any questions or requests, please do not hesitate to contact us.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

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cc: Clerk of Court (AMD) (without Enclosure)